

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DeWAYNE WALKER, SR, KAREN
WALKER, his wife, D.W., JR., minor
child, and T.W., minor child,

Plaintiffs,

v.

THE CITY OF WILMINGTON, a political
subdivision of the State of Delaware,
DETECTIVE MICHAEL R. LAWSON, JR.,
individually and in his official capacity, and
UNKNOWN ENTITIES,

Defendants.

C.A. No. 06-288 (MPT)

**JOINTLY CONSENTED PROTECTIVE ORDER SETTING CONDITIONS FOR
DEPOSING THE CONFIDENTIAL INFORMANT AND PROHIBITING
DISCLOSURE OF THE IDENTITY OF THE CONFIDENTIAL INFORMANT**

Pursuant to Paragraph 4 of the Scheduling Order, counsel finds it necessary to apply to the Court for a Protective Order specifying the terms and conditions for the disclosure of the identity of the confidential informant who supplied information to Detective Jeffrey Silvers which led to the SWAT raid that is the subject of this lawsuit (hereafter "the confidential informant").

As required by Paragraph 4 of the Scheduling Order, counsel for each party have conferred and reached an agreement as to the following terms and conditions that shall be imposed to prevent disclosure of the confidential informant's identity:

1.) Plaintiff's counsel will depose the confidential informant on TBD, 2007, at the Wilmington Police Station, 300 North Walnut Street, Wilmington, DE 19805.

2.) Attendance at the deposition of the confidential informant will be limited to: (1) Philip B. Bartoshesky, Esquire, attorney of record for Plaintiffs, (2) Alex J. Mili, Jr., Esquire,

confidential informant, (5) Plaintiff DeWayne Walker, and one other officer from the Wilmington Police Department other than Detective Jeffrey Silvers. No other persons may attend the deposition.

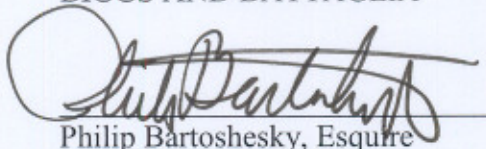
3.) The transcript of the deposition shall not state the name of the confidential informant, but shall instead identify the deponent as "confidential informant".

4.) Counsel shall not disseminate the confidential informant's deposition transcript (or any portion thereof). Plaintiffs' counsel shall return to Defendants' counsel all hard copies of the deposition transcript, and shall certify under oath that all known copies of the transcript have been returned to Defendants' counsel.

5.) Counsel and Plaintiff Dwayne Walker shall not disclose any descriptive information about the confidential informant, including but not limited to the confidential informant's home or business addresses, date of birth, gender, race, age, height, weight, hair color, eye color or any other distinguishing physical characteristics.

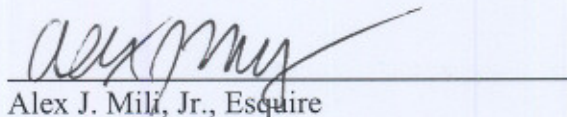
6.) Plaintiffs' counsel has explained to Plaintiff Dwayne Walker that he may be subject to Court sanctions if he violations any provisions of this Order.

BIGGS AND BATTAGLIA



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CITY OF WILMINGTON LAW DEPARTMENT



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Attorney for Defendants

SO ORDERED this _____ day of _____, 2007.

J.